

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON and JAMES
EVERETT SHELTON, individually and on
behalf of a class of all persons and entities
similarly situated,

Plaintiffs

vs.

AGENTRA, LLC, ANGELIC
MARKETING GROUP L.L.C., and
MATTHEW JONES

Defendants.

Case No. 18-cv-615-PLD

COMPLAINT-CLASS ACTION

DECLARATION OF ANTHONY I. PARONICH

1. I make this affidavit in support of Plaintiffs' Response to Monica Aboud's Motion to Intervene. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. I am an attorney duly admitted to practice in the Commonwealth of Massachusetts, I am over 18 years of age, am competent to testify and make this affidavit on personal knowledge. I have extensive experience in the prosecution of class actions on behalf of consumers, particularly claims under the TCPA and have been appointed by this Court to be class counsel in this matter.

3. In November of 2018 Ms. Aboud's counsel contacted my co-counsel and I regarding her claim.

4. We informed counsel for Ms. Aboud that there was a pending action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2020 in Plymouth County, Massachusetts.

/s/ Anthony I. Paronich

Anthony I. Paronich